

## **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND )  
EXCHANGE COMMISSION, )  
Plaintiff, )  
v. ) Civil Action No. 1:18-cv-6718 (PGG)  
JOHN A. PAULSEN, )  
Defendant. )

## Plaintiff's Witness List

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i) and the Court’s Individual Rules of Practice in Civil Cases X(A)(9), Plaintiff SEC sets forth the following list of “witnesses whose testimony is to be offered in its case in chief.” All SEC witnesses will testify by declaration and deposition designation and, if requested by Defendant Paulsen, may be cross-examined via video in accordance with the Court’s Individual Rules of Practice in Civil Cases X(C)(3) for bench trials.

### Witnesses Plaintiff Expects to Present in its Case in Chief:

Navnoor Kang  
Deborah Kelley  
Scott Shiffman  
Elizabeth Baird  
Donald Jones  
Ann Tushaus (SEC staff member – summary witness)

**Witnesses Plaintiff May Call if the Need Arises for Rebuttal or Authentication:**

Alllen Oppici  
Andrew Rochat  
Jon Walker  
Sherene Chou  
John Paulsen  
Sterne Agee / Stifel document custodian  
NYSCRF document custodian

Date: June 29, 2020

Respectfully submitted,

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION

/s/ Alyssa A. Qualls

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